

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Commission's Rules)	
To Ensure Compatibility with)	CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems)	
)	

QUARTERLY REPORT FOR CENTURYTEL WIRELESS, INC.

CenturyTel Wireless, Inc., and its affiliated commercial mobile radio service ("CMRS") carriers (collectively "CenturyTel"), hereby respectfully submit this Quarterly Report regarding their request for a limited waiver of the Phase II E911 rules.¹

I. PSAP REQUESTS FOR PHASE II E911 SERVICE

CenturyTel hereby informs the Commission that, as of yet, it has still not received any valid public safety answering point ("PSAP") requests for Phase II E911 service. Thus, CenturyTel is not yet required by the Commission's rules to be capable of providing Phase II

¹ Petition of CenturyTel Wireless, Inc. for a Limited Waiver filed in CC Docket No. 94-102 on September 25, 2001 ("Waiver"). A list of CenturyTel's carrier subsidiaries and partnerships is attached as Exhibit A to its Waiver. On November 30, 2001, CenturyTel supplemented its Waiver pursuant to the Bureau's *Waiver Public Notice* ("First Supplement"). See *Public Notice*, Wireless Telecommunications Bureau Provides Guidance on Filings by Small and Mid-Sized Carriers Seeking Relief from Wireless E911 Phase II Automatic Location Identification Rules, DA 01-2459, October 19, 2001 ("*Waiver Public Notice*").

E911 service.² Moreover, as CenturyTel plans to deploy a network-based solution, it has not yet incurred any Phase II-related obligations.³

II. UPDATE ON TECHNICAL ISSUES NEEDED TO ACHIEVE PHASE II COMPLIANCE

In its Waiver and First Supplement, CenturyTel explained that it requires critical hardware and software upgrades to its switches from its switch vendor, Nortel, to make its network Phase II-capable.⁴ In addition, CenturyTel noted that receipt of the hardware upgrades is a precondition to installation of the software upgrades. Nortel, CenturyTel's switch vendor, is the only source of these critical upgrades. As of the date of this report, four (4) of CenturyTel's switches have received the hardware upgrades. All hardware upgrades are expected to be complete by May 24, 2002. In addition, CenturyTel has issued a purchase order for Nortel's MTX-10 software upgrade for all of its switches. CenturyTel is in the process of consulting with Nortel to determine mutually acceptable conversion dates. CenturyTel tentatively anticipates conversion to be complete for all switches by June 30, 2002.

Once the MTX-10 software upgrade is complete, CenturyTel will be required to purchase an additional software module from Nortel to enable its network to be Phase II-ready. This upgrade can typically be implemented extremely quickly with minimal lead-time. The cost, however, is significant—approximately \$1.1 million. CenturyTel was informed by Nortel of this additional cost within the last few weeks. In light of this unexpected increase in its compliance costs, and the severe financial burden Phase II E911 compliance places on rural carriers like

² See 47 C.F.R. § 20.18.

³ See *Waiver Public Notice*.

⁴ Waiver at 6.

CenturyTel, CenturyTel intends to purchase this upgrade on a switch-by-switch basis upon receipt of valid PSAP requests for Phase II E911 service (which, again, has not yet occurred).

III. REVISED PHASE II E911 IMPLEMENTATION TIMETABLE

To mitigate the technical and financial burdens of Phase II E911 compliance, CenturyTel's Waiver previously set forth aggressive targets for deploying certain Phase II capabilities not tied to receipt of valid PSAP requests and proposed a graduated implementation schedule to provide Phase II E911 service.⁵ In light of the new information regarding the extent of these burdens and the fact that CenturyTel has not yet received any valid PSAP requests for Phase II E911 service, CenturyTel has revised its Phase II E911 implementation schedule as follows:

- CenturyTel will continue to file quarterly updates with the FCC regarding its progress on E911 implementation. These quarterly updates will include information on the status of the switch upgrades and the anticipated timeframe for implementation of a location solution.
- By May 24, 2002, CenturyTel expects to have completed hardware upgrades in all of its switches.⁶ The exact receipt, installation and testing dates for its upgrades are subject to the control of CenturyTel's switch vendor, Nortel.
- By June 30, 2002, CenturyTel expects to have completed the Nortel MTX-10 software upgrades in all of its switches.⁷ Again, the exact receipt, installation and

⁵ *Id.* at 10-11.

⁶ Originally, CenturyTel believed it would have one switch upgrade complete (that is, both new hardware and new software installed) by March 31, 2002 to enable evaluation and testing of Phase II E911 network-based solutions.

testing dates for its upgrades are subject to the control of CenturyTel's switch vendor, Nortel. In addition, CenturyTel now intends to forego an evaluation and testing period of a network-based solution.

- Once CenturyTel receives a valid PSAP Phase II request (which has not yet occurred), it immediately will purchase and begin to implement the remaining Nortel upgrade as well as a network-based solution for the relevant switch and system.⁸
- Once CenturyTel receives a valid PSAP Phase II request (which, again, has not yet occurred), it expects to be able to provide Phase II E911 location information to 50 percent of the pertinent service area within 9 months of the date of that request and to 100 percent of the pertinent service area within 18 months of the date of that request.

CenturyTel initially hoped to commence Phase II deployment after purchase of a network-based solution. Due to cost and burden of compliance, CenturyTel intends to deploy Phase II capabilities as valid PSAP requests are received. In any event, tying deployment to receipt of valid Phase II PSAP requests, rather than an equipment purchase date, is consistent with CenturyTel's compliance obligations under the FCC's Phase II E911 rules.⁹ As the FCC itself contemplates in its rules, this approach facilitates efficient resource allocation by focusing CenturyTel's Phase II compliance efforts toward service areas capable of utilizing Phase II location information. While CenturyTel still seeks flexibility concerning the intermediate compliance benchmark—nine (9) months as opposed to six (6) months to achieve 50 percent

⁷ This is slightly later than the May 31, 2002 date by which CenturyTel originally envisioned having such Nortel hardware and software upgrades complete.

⁸ CenturyTel originally hoped to purchase its network-based solution by May 31, 2002.

⁹ 47 C.F.R. § 20.18(f).

coverage—CenturyTel does not seek a waiver of the final compliance benchmark of achieving 100 percent coverage in eighteen (18) months.

CenturyTel reiterates that its ability to adhere to the implementation schedule proposed herein is dependent on its switch vendor, Nortel. CenturyTel also observes that there are a limited number of vendors to supply Phase II E911 solutions and it recognizes that they may become backlogged as numerous carriers seek to implement this service. CenturyTel will obviously be dependent on the availability of its Phase II E911 vendor to satisfy its implementation schedule. If such a backlog develops and adversely affects CenturyTel's proposed implementation schedule, it will promptly notify the Commission.

IV. CONCLUSION

CenturyTel is making demonstrable progress towards Phase II E911 implementation. Should the Commission Staff have any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

CENTURYTEL WIRELESS, INC.

A handwritten signature in black ink, appearing to read "Nancy Gillien Spooner", is written over a horizontal line.

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